

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re KEON FRANK</b>	<b>:</b>	<b>CHAPTER 13</b>
	<b>:</b>	
<b>Debtor(s)</b>	<b>:</b>	<b>BANKRUPTCY NO. 23-11974</b>

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Keon Frank, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by **US Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V** on December 23, 2024. Debtors believe they can become current on all post-petition payments due under the August 12, 2024 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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